



STATE OF WASHINGTON
DEPARTMENT OF LABOR AND INDUSTRIES
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August 17, 2007

Cynthia Lopez, PhD
Chair, Pesticide Incident Reporting and Tracking Panel
243 Israel Road SE
P.O. Box 47846
Tumwater, Washington 98504-7846

Dear Dr. Lopez:

Thank you for your letter dated July 31, 2007, concerning laboratory analysis of blood samples for cholinesterase depressions required under our workplace monitoring rule for pesticide handlers.

I appreciate the interest and support for our efforts provided by the Pesticide Incident Reporting and Tracking Panel (PIRT). We believe that our cholinesterase monitoring requirement is important for worker protection in our state. In the beginning of the cholinesterase monitoring effort, the Department of Health (DOH) Public Health Laboratory (PHL) was identified as only a temporary source for blood analysis. My agency asked PHL to reconsider their decision to handle these blood samples, however, they declined citing other priorities. We did negotiate a third year (2006) at PHL by supplying both financial resources and staffing to PHL; it was understood by both DOH and L&I that there would be no further extension of activities at PHL after 2006. Fortunately, we had the able assistance of your department's PHL to help us identify and select Pathology Associates Medical Laboratory (PAML) in Spokane.

While there have been first year analytical issues associated with red blood cell (RBC) cholinesterase analysis, these issues are very similar and reminiscent of those encountered in the first year startup at PHL. We do not expect to have the same issues occur in the second year at PAML. Between now and the start of the next pesticide application cycle in early 2008, we intend to work with PAML to ensure good quality control practices and data integrity. Having one cycle of experience to identify transition issues, especially with such a difficult analysis as RBC cholinesterase, has been very helpful to PAML just as it was at PHL; we will also engage former Scientific Advisory Committee members to assist us in assuring both proficient analysis and quality data reporting.

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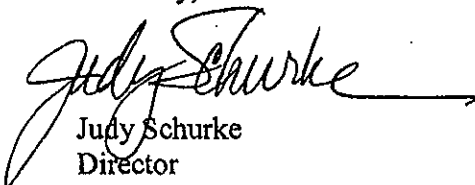
My comments on your specific bullet points are:

- L&I will work directly with two of the leading members of the former SAC to ensure quality and confidence in PAML and its analytical data instead of reconvening the Scientific Advisory Committee (SAC) or a similar group.
- L&I is committed, as is PAML, to ensuring high quality blood analyses in 2008. In addition to working with the external experts mentioned above, our own Industrial Hygiene Laboratory Director will assist with any data quality issues.
- Cholinesterase monitoring data will be centralized at L&I including distribution of data reports and summary information which we will continue to provide, as appropriate, to PIRT. The DOH Cholinesterase Monitoring Data System (CMDS) will not be utilized.
- L&I is committed to conducting on-site follow-ups for each employer with employees having a significant cholinesterase depression, assuring proper notification of test results to affected employees, and alerting DOH to human pesticide exposures when appropriate. Program information will continue to be provided to PIRT and other stakeholders through regular summary reports.
- We plan to keep stakeholders informed in the future by providing regular distribution of summary data. Additionally, L&I's Division of Occupational Safety and Health (DOSH) plans to convene a meeting before the end of the year to provide an opportunity for stakeholders to get updated on the program and for them to provide comments to L&I.
- Our timeline for assuring laboratory data integrity, convening a stakeholder meeting, centralizing laboratory data at L&I and ensuring good quality control practices with respect to cholinesterase monitoring data is by the end of the year. We want to have everything completed and in place by the beginning of the 2008 pesticide season.

As you are aware, the final report to the Legislature was completed and submitted earlier this year. The work of SAC has concluded so there will be no future report from SAC or a sub-committee of SAC. We will produce a brief annual report summarizing activities and data. We are pleased to have a highly qualified senior Industrial Hygienist, Pamela Edwards, as our representative on PIRT. Pam will be able to provide brief updates on our program through her attendance at your meetings.

Like you, we believe cholinesterase monitoring is very important for protecting workers. Thank you for your comments and support.

Sincerely,



Judy Schurke
Director

cc: Mary Selecky, DOH Secretary
Stephen M. Cant, CIH, DOSH Director

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